

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: ANGELA M. FASCIANA

Debtor(s)

CHAPTER 13

JACK N. ZAHAROPOULOS

CHAPTER 13 TRUSTEE

Movant

vs.

ANGELA M. FASCIANA

CASE NO: 5-22-01974-HWV

Respondent(s)

TRUSTEE'S MOTION TO CONVERT CASE TO CHAPTER 7

AND NOW, on February 7, 2024, Jack N. Zaharopoulos, Standing Chapter 13 Trustee for the Middle District of Pennsylvania, through his attorney, Agatha R. McHale, Esquire, and moves this Honorable Court for conversion of the above-captioned Chapter 13 bankruptcy case in accordance with Section 1307(c) of 11 U.S.C., due to failure to file a Chapter 13 plan.

WHEREFORE, Movant requests this Honorable Court to enter an Order of Court converting the above-captioned case to Chapter 7 in accordance with 11 U.S.C. Sec 1307(c).

Respectfully submitted,

/s/ Agatha R. McHale, Esquire

Id: 47613

Attorney for Trustee

Jack N. Zaharopoulos

Standing Chapter 13 Trustee

8125 Adams Drive, Suite A

Hummelstown, PA 17036

Phone: (717) 566-6097

email: amchale@pamd13trustee.com

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CERTIFICATE OF SERVICE

I certify that I am more than 18 years of age and that on February 7, 2024, I served a copy of this Motion to Convert and Proposed Order on the following parties by 1st Class mail from Hummelstown, PA, unless served electronically.

Served Electronically

EUGENE J. DOUD, ESQUIRE
1418 MAIN STREET, SUITE 102
PECKVILLE, PA 18452

UNITED STATES TRUSTEE
1501 NORTH 6TH STREET
BOX 302
HARRISBURG, PA 17102

Served by First Class Mail

ANGELA M. FASCIANA
125 CONSTITUTION AVE
JESSUP, PA 18434-1239

I certify under penalty of perjury that the foregoing is true and correct.

Dated: February 7, 2024

/s/ Vickie Williams
Office of the Chapter 13 Trustee
Jack N. Zaharopoulos
Suite A, 8125 Adams Dr.
Hummelstown, PA 17036
Phone: (717) 566-6097
email: info@pamd13trustee.com

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vs.

ANGELA M. FASCIANA

Respondent(s)

ORDER CONVERTING CASE

Upon consideration of the Trustee's Motion to Convert, it is hereby ORDERED that the above-captioned bankruptcy case be and hereby is CONVERTED to a Chapter 7.